

1 **VERONICA A.F. NEBB**

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11 Attorneys for Defendant CITY OF VALLEJO

12 **UNITED STATES DISTRICT COURT**

13 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

14 NEFTALI MONTERROSA, individually and
15 as co-successor-in-interest to Decedent SEAN
16 MONTERROSA; NORA MONTERROSA,
17 individually and as co-successor-in-interest to
18 Decedent SEAN MONTERROSA;
19 MICHELLE MONTERROSA, individually;
20 ASHLEY MONTERROSA, individually,

21 Plaintiffs,

22 vs.

23 CITY OF VALLEJO, a municipal
24 corporation; JARRETT TONN, individually,
25 and, Vallejo police officers DOES 1-25,
26 inclusive,

27 Defendants.

Case No: 2:20-cv-01563-DAD-DB

**DECLARATION OF VERONICA A.F.
NEBB IN SUPPORT OF DEFENDANT
JARRETT TONN'S MOTION FOR
STAY**

28 I, Veronica A.F. Nebb, hereby declare and state:

1. I am an attorney-at-law licensed to practice in the State of California and I am the City Attorney for the City of Vallejo. I have personal knowledge of the matters set forth in this Declaration, except where stated on information and belief, and could and would competently

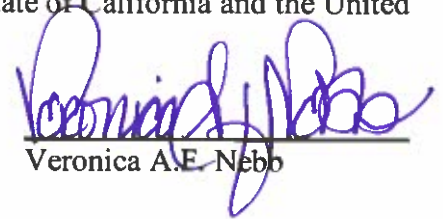
1 testify to them under oath if called as a witness.

2 2. This morning I spoke to members of the Attorney General's Office regarding the
3 status of the criminal investigation into Officer Jarrett Tonn's shooting of Sean Monterrosa.
4 While the Attorney General's Office cannot provide a promised timeline at this time, based on
5 my discussions, the City respectfully requests that the Court grant a stay of discovery as to Jarrett
6 Tonn in this case for three months.

7 3. I will also be seeking a personal meeting with Attorney General Bonta regarding
8 this matter. If at the end of three months the Attorney General's Office has not issued a decision
9 charging or clearing Officer Tonn, I have the name of the appropriate individual to subpoena for
10 additional information and will provide that information to the Court.

11 Executed on this 14th day of November, 2023, at Vallejo, California.

12 I declare under penalty of perjury under the laws of the State of California and the United
13 States that the foregoing is true and correct.

14 
Veronica A.E. Nebo